

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Judith Ann Hollenbeck	:	CHAPTER 13
Debtor(s)	:	
	:	
PNC BANK NATIONAL ASSOCIATION	:	NO: 4:19-bk-01850-MJC
Movant	:	
Vs.	:	
	:	
Judith Ann Hollenbeck	:	
Debtor(s)	:	
Jack N. Zaharopoulos	:	
Trustee	:	

**DEBTOR'S ANSWER TO MOTION DIRECTING DEBTOR
TO FILE AMENDED CHAPTER 13 PLAN**

1. Debtor acknowledges she must file an Amended Chapter 13 Plan, however she requires more than the 14 days requested to Movant.
2. Debtor requires thirty (30) days to file an Amended Plan as she recently obtained new employment as her prior employment was terminated due to elimination of her position. Debtor needs the additional time in order to budget sufficient funds to cure any post-petition arrearages.

WHEREFORE, Debtor requests that an Order be entered granting her thirty (30) days to file an Amended Chapter 13 Plan.

Respectfully submitted,
CASALE & BONNER, P. C.

/s/ Norman M. Lubin, Esquire
Norman M. Lubin - I.D. #14780
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of November 2021, did cause the foregoing Answer to Motion to Compel an Amended Chapter 13 Plan to be filed via ECF. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic Filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic Filing constitutes service of the filed document and no additional service upon the filing user is required.

Respectfully submitted,
CASALE & BONNER, P. C.

/s/ Norman M. Lubin, Esquire
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